

1. From at least in or about August 2017 up to and including at least in or about December 2019, in the Southern District of New York and elsewhere, MICHAEL ACKERMAN, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, ACKERMAN made false statements and furnished false documents concerning the balance of an investor trading account, which were relied upon by

investors and a cryptocurrency investment fund in calculating profits and payouts to ACKERMAN and others, and in connection therewith and in furtherance thereof, ACKERMAN transmitted and caused to be transmitted interstate electronic mail, telephone calls, and wire transfers of funds.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT TWO**  
(Money Laundering)

The Grand Jury further charges:

2. From at least in or about June 2018 up to and including in or about December 2019, in the Southern District of New York and elsewhere, MICHAEL ACKERMAN, the defendant, knowing that the property involved in a certain financial transaction represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such a financial transaction, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, to wit, ACKERMAN diverted investor funds that were the proceeds of wire fraud perpetrated by ACKERMAN into accounts personally controlled by ACKERMAN, and used those funds to purchase at least five pieces

of real estate that were titled in the names of persons other than ACKERMAN, in order to conceal the nature, the location, the source, the ownership, and control of those funds.

(Title 18, United States Code, Section 1956(a)(1)(B)(i).)

**FORFEITURE ALLEGATIONS**

3. As a result of committing the offense alleged in Count One of this Indictment, MICHAEL ACKERMAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

- a. 29 Kimrey Ln, Highway 12 East, Harlowton, Montana, 59085, Legal Description S24, T08 N, R13 E, Tract 3 of COS #104358 containing 154.91 acres;
- b. 1116 Miramar Drive, Delray Beach, Florida, 33483, Legal Description The Williamson-Deibel Sub W 15 FT OF LT 5, LTS 6, 7 & E 32.5 FT OF LT 8;
- c. 3300 Wooster Road, Rocky River, Ohio, 44116, Legal Description SEC 14 SEC 17 30429047;
- d. 3875 E Lake Road, Sheffield, Ohio, 44054, Parcel



Number 0300043101009; and

e. 2281 St. Marks Rd., Valley City, Ohio, 44280, Legal

Description: TR 1 LOT 21 W MID PT 5.500A.

4. As a result of committing the offense alleged in Count Two of this Indictment, MICHAEL ACKERMAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and the following specific property:

- a. 29 Kimrey Ln, Highway 12 East, Harlowton, Montana, 59085, Legal Description S24, T08 N, R13 E, Tract 3 of COS #104358 containing 154.91 acres;
- b. 1116 Miramar Drive, Delray Beach, Florida, 33483, Legal Description The Williamson-Deibel Sub W 15 FT OF LT 5, LTS 6, 7 & E 32.5 FT OF LT 8;
- c. 3300 Wooster Road, Rocky River, Ohio, 44116, Legal Description SEC 14 SEC 17 30429047;
- d. 3875 E Lake Road, Sheffield, Ohio, 44054, Parcel Number 0300043101009; and
- e. 2281 St. Marks Rd., Valley City, Ohio, 44280, Legal Description: TR 1 LOT 21 W MID PT 5.500A.

Substitute Asset Provision

5. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred or sold to, or deposited with, a third person;

c. Has been placed beyond the jurisdiction of the Court;

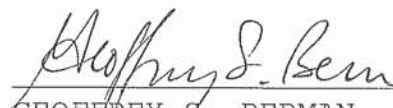
d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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GEOFFREY S. BERMAN  
United States Attorney